

Patent Application 09/658,432  
Docket No. P13433US2

### REMARKS

Claims 1-11 are currently pending in the present patent application. Reconsideration and allowance of the application is respectfully requested in view of the following remarks.

#### **Claim rejections – 35 USC §102**

In paragraph 2 of his report, the Examiner rejected claims 1 and 2 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,233,458 (hereinafter called Haumont).

The invention of claim 1 is a method of consistently selecting a particular Packet Data Service Node (PDSN) from a plurality of PDSNs in a packet data network to host a data session for a Mobile Node (MN). The method stores a static lookup table in a Packet Core Function (PCF). The table includes a list of identifiers for MNs and an associated list of the plurality of PDSNs in the network. The method further utilizes the lookup table at the PCF for associating the identifier for the MN with a PDSN and selects the associated PDSN at the PCF to host the data session for the MN.

Haumont describes a procedure for rerouting an ongoing connection for a MN in a telecommunications network. The telecommunications network comprises a plurality of network elements. In particular, the procedure of Haumont realizes an inter-Serving GPRS Support Node (SGSN) rerouting of data packet in a General Packet Radio Service (GPRS) network. For doing so, Haumont uses context information of Mobile Nodes (MNs) for deciding that a user data packet must be sent to a specific Gateway GPRS Service Node (GGSN). The context information is stored in all network elements (BTS, BSC, SGSN and GGSN) and is used for routing information. The context information can be divided into mobility management (MM) and packet data protocol (PDP) context

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part of a MN. The MM part tells where the MN is located and in which state (idle, standby, ready) while the PDP part tells the routing information.

However, Haumont does not disclose or teach a method for *consistently selecting* a PDSN from a plurality of PDSNs. Haumont merely describes a procedure for *rerouting a traffic of data packets* from one SGSN to another SGSN. Haumont describes context information, which consists of mobility management (location and status of a MN) and packet data protocol context part (routing information) of a MN. Nevertheless, since the context information of Haumont is limited to mobility management and PDP context part, Haumont cannot disclose a method for *storing* a static look up table in a Packet Core Function (PCF) and *associating* an identifier of a MN with a PDSN in a *static* look up table. As a consequence, Haumont does not disclose a method for *selecting an associated PDSN for hosting a data session for a MN*. For these reasons, Applicants kindly request withdrawal of the rejection.

Briefly, since Haumont does not describe whole or parts of the claimed invention, it can be appreciated that claim 2, which depends directly from claim 1, while adding further limitations thereto, is believed patentable for the same reasons provided in support of claim 1. Therefore, Applicants respectfully request withdrawal of the rejection.

#### **Allowable Subject Matter**

In paragraph 3 of his report, the Examiner indicated that he was willing to allow claim 3 if it is rewritten. However, claim 3 depends directly from claim 1, which is patentable. Therefore, claim 3 does not need to be rewritten.

Furthermore, Applicants kindly thank the Examiner for allowing claim 4-11 in paragraph 4 of his report.

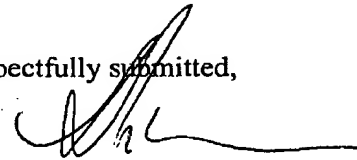
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In view of the abovementioned remarks, Applicants respectfully request favourable action for all pending claims.

CONCLUSION

Claims 1 and 2 are thus in condition for favourable action. If the Examiner would find that the further prosecution of the application would be facilitated by a telephone interview, the Examiner is hereby invited to call the undersigned at (514) 345-7900 ext. 2596.

Respectfully submitted,



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Date: Jan. 08, 2004